

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In Re Brent Crude Oil Futures Litigation

1:13-md-02475-ALC

This document applies to:

1:13-cv-07443-ALC (Coordinated Case)

**DECLARATION OF ARMAND LUMENS IN SUPPORT OF SHELL
INTERNATIONAL TRADING AND SHIPPING COMPANY 'S MOTION TO DISMISS**

I, Armand Lumens, hereby declare as follows:

1. I am the Executive Vice President Finance Trading & Supply of Shell International Trading and Shipping Company Ltd. ("STASCO"), and I reside and work in London, England. In my capacity as Executive Vice President Finance Trading & Supply, I am familiar with STASCO's corporate structure and the business it conducts. With respect to all other matters, my knowledge is based upon my knowledge and review of corporate books and records maintained in the ordinary course of business and discussions with the appropriate STASCO personnel. I submit this declaration in support of STASCO's Motion to Dismiss for Lack of Personal Jurisdiction.

2. The following statements are true during the entire period at issue in the Second Amended Class Action Complaint in this litigation and currently.

3. STASCO is a limited company incorporated under the laws of England and headquartered in London, England.

4. STASCO is engaged in trading and provides shipping services on behalf of various affiliates and subsidiaries of Royal Dutch Shell, plc ("RDS"). STASCO engages in trading activities both as a principal on its own behalf and as an agent for certain affiliates and

subsidiaries of RDS. In these capacities, STASCO trades energy commodities such as natural gas, power, crude oil, and refined products.

5. STASCO did not and does not import Brent, Forties, Oseberg or Ekofisk cargoes into the United States. To the extent STASCO was part of a chain of transactions of cargoes that ultimately were sent to the United States, ownership was transferred from STASCO to the buyer of the cargo at the load port in the United Kingdom or Norway as appropriate, *i.e.*, outside the United States.

6. STASCO is not licensed to, or registered to conduct business in the United States.

7. STASCO does not employ any officer, agent, distributor, servant, employee, trader, or other representative anywhere in the United States for the transaction of business.

8. STASCO does not maintain any office, place of business, or mailing address in the United States. STASCO's offices, executives, books and records are located in England.

9. STASCO does not own, use, or possess any real property in the United States.

10. STASCO does not maintain any telephone listing in the United States.

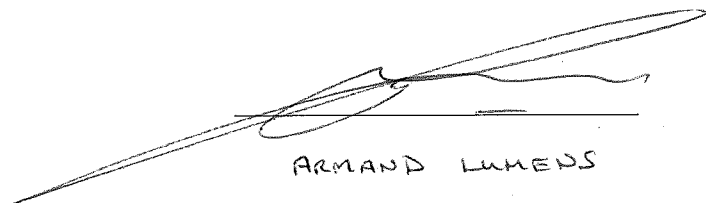
11. STASCO does not pay taxes in the United States.

12. STASCO has not appointed an agent for service of process in the United States.

* * *

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 28 day of May, 2015.


ARMAND LUENS